

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 18-13947</b>
<b>Stacy A McCauley Cooney</b>	:	<b>Chapter 13</b>
	:	<b>Judge Magdeline D. Coleman</b>
<b>Debtor(s)</b>	:	<b>*****</b>
	:	
<b>Nationstar Mortgage LLC d/b/a Mr.</b>	:	
<b>Cooper</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>Stacy A McCauley Cooney</b>	:	
<b>William C. Miller, Esq., Trustee</b>	:	
<b>Respondents</b>	:	

**CERTIFICATE OF DEFAULT**

Now comes Nationstar Mortgage LLC d/b/a Mr. Cooper, its successor and assigns (hereinafter, "Creditor") by and through counsel, and certifies to this Court that Stacy A McCauley Cooney ("Debtor") has failed to comply with the Order approving the stipulation dated April 6, 2020, a copy of which is attached hereto as Exhibit "A", by failing to make timely payments in accordance with the stipulation. Pursuant to the Order, the automatic stay will terminate upon the filing of a Certificate of Default.

Creditor hereby avers that Debtor is delinquent for the January 1, 2021 payment and for all arrears that were due thereafter. Further, pursuant to the terms of the stipulation, Creditor provided Debtor and their Counsel with a Notice of Default on April 1, 2021, allowing Debtor ten (10) days to cure the default. A copy of said default letter is attached hereto as Exhibit "B". Ten (10) days have passed and the default has not been cured.

WHEREFORE, upon the filing of this Certificate of Default, Creditor requests that the Court enter an order terminating the automatic stay.

Respectfully submitted,

/s/ Sarah E. Barngrover

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Sarah E. Barngrover, Esquire (323972)  
Adam B. Hall (323867)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028  
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Attorneys for Creditor  
The case attorney for this file is Sarah E.  
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: **Judge Magdeline D. Coleman**  
**Debtor(s)** : \* \* \* \* \*  
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**Nationstar Mortgage LLC d/b/a Mr.** :  
**Cooper** :  
**Movant** :  
:  
**v.** :  
:  
**Stacy A McCauley Cooney** :  
**William C. Miller, Esq., Trustee** :  
**Respondents** :

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Certificate of Default was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Esq., Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105,  
ecfemails@ph13trustee.com

Brad J. Sadek, Attorney for Stacy A McCauley Cooney, Sadek and Cooper, 1315 Walnut  
Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on April 16, 2021:

Stacy A McCauley Cooney, 313 BeechTree Drive, Broomall, PA 19008

Stacy A McCauley Cooney, 313 Beechtree Dr, Broomall, PA 19008

Asset Acceptance, LLC, P.O. Box 1630, Warren, MI 48090

Pennsylvania Department of Revenue, 110 N 8th St., Ste 204B, Philadelphia, PA 19107

PNC Bank, 300 Fifth Avenue, Pittsburgh, PA 15222

DATE: 4/16/2021

/s/ Sarah E. Barngrover

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